

**UNITED STATES BANKRUPTCY COURT** ]  
**SOUTHERN DISTRICT OF NEW YORK** ]

**DELPHI CORPORATION,** ]  
 ]  
 ]  
**Debtor.** ]

**In Re: Case No. 05-44481**  
**Chapter 11**  
**Honorable Robert D. Drain**

**RESPONSE OF GEORGE & SIPES, LLP CLAIMANTS TO DEBTORS' NINETEENTH  
OMNIBUS OBJECTION (SUBSTANTIVE) PURSUANT TO 11 U.S.C. §502(b) AND  
FED.R.BANKR.P. 3007 TO CERTAIN (A) INSUFFICIENTLY DOCUMENTED  
CLAIMS, (B) CLAIMS NOT REFLECTED ON DEBTORS' BOOKS AND RECORDS,  
(C) UNTIMELY CLAIM, AND (D) CLAIMS SUBJECT TO MODIFICATION, TAX  
CLAIMS SUBJECT TO MODIFICATION, MODIFIED CLAIMS ASSERTING  
RECLAMATION, AND CONSENSUALLY MODIFIED AND REDUCED CLAIMS**

Comes now Claimants represented by the firm of George & Sipes, LLP<sup>1</sup> as described on attachment A hereto (hereinafter referred to as "George & Sipes Claimants"), and make this response with respect to the Debtors' Objection to the claims presented by the George & Sipes Claimants as follows:

1. George & Sipes Claimants properly filed their Proof of Claims on or before July 28, 2006.
2. George & Sipes Claimants filed their claims requesting the valuation of their tort action to be set at \$30,000.00 each. While claimants do not believe that the value of their claims were overstated, it is believed to be in the best interest of the claimants given the Debtors' filing status to resolve these claims for a modified value.

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<sup>1</sup> George & Sipes, LLP was formerly known as Laudig George Rutherford & Sipes at the time of the filing of the original proof of claims for the represented claimants of the firm.

3. Counsel for Claimants has negotiated with Counsel for Debtors in an attempt to bring resolution to these claims and has consensually reached a modification of these claims for a reduced value. It is likely that resolution of these claims in a modified manner can be achieved. Therefore, the George & Sipes Claimants are recognized by the Debtor as Consensually Modified and Reduced Claims under Debtors' Objection.

4. George & Sipes Claimants request that this Court formally adjourn these claims so that resolution of the claims may be achieved and that these claimant/creditors be allowed the modified value of the claim and that the status of the claims be deemed an allowed and secured claim for the attached claimant/creditors.

Wherefore, George & Sipes Claimants respectfully tender the above response to Debtors' Nineteenth Omnibus Objection (Substantive) Pursuant To 11 U.S.C. §502(B) and Fed.R.Bankr.P. 3007 to Certain (A) Insufficiently Documented Claims, (B) Claims Not Reflected On Debtors' Books And Records, (C) Untimely Claim, and (D) Claims Subject To Modification, Tax Claims Subject To Modification, Modified Claims Asserting Reclamation, and Consensually Modified And Reduced Claims.

Dated this the 9<sup>th</sup> day of August, 2007



Linda George, IN Atty No. 15744-49  
Kathleen A. Farinas, IN Atty No. 20283-34  
George & Sipes, LLP  
Attorneys for the Attached Creditor Listing  
151 North Delaware Street, Suite 1700  
Indianapolis, IN 46204  
TEL: (317) 647-6071/FAX: (317) 685-6505  
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ATTACHMENT A  
GEORGE SIPES, LLP CLAIMANT/CREDITOR LIST  
DELPHI BANKRUPTCY

| August 9, 2007                  |               |                      |   |  | Modified Claim Value |
|---------------------------------|---------------|----------------------|---|--|----------------------|
| Creditor Name                   | Claim Number  | Creditor Notice Name | Creditor Notice Address                                   |  |                      |
| Arbogast, Michael A & Rebecca C | 12032         | George & Sipes, LLP  | 151 North Delaware St., Ste. 1700, Indianapolis, IN 46204 |  | \$5,000.00           |
| Bex, Russell & Barbara A        | 12033         | George & Sipes, LLP  | 151 North Delaware St., Ste. 1700, Indianapolis, IN 46204 |  | \$5,000.00           |
| Bueke, Robert L & Norma J       | 15756 & 12034 | George & Sipes, LLP  | 151 North Delaware St., Ste. 1700, Indianapolis, IN 46204 |  | \$5,000.00           |
| Buis, James & Jacqueline        | 12035         | George & Sipes, LLP  | 151 North Delaware St., Ste. 1700, Indianapolis, IN 46204 |  | \$5,000.00           |
| Canter, Richard & Louanna       | 12036         | George & Sipes, LLP  | 151 North Delaware St., Ste. 1700, Indianapolis, IN 46204 |  | \$5,000.00           |
| Cloncs, Donald & Carole L       | 12037         | George & Sipes, LLP  | 151 North Delaware St., Ste. 1700, Indianapolis, IN 46204 |  | \$5,000.00           |
| Davis II, Robert E              | 12038         | George & Sipes, LLP  | 151 North Delaware St., Ste. 1700, Indianapolis, IN 46204 |  | \$5,000.00           |
| Ennis, Donald & Carol           | 12039         | George & Sipes, LLP  | 151 North Delaware St., Ste. 1700, Indianapolis, IN 46204 |  | \$5,000.00           |
| Hoyt, Arthur & Vivian           | 12040         | George & Sipes, LLP  | 151 North Delaware St., Ste. 1700, Indianapolis, IN 46204 |  | \$5,000.00           |
| Hubbard, Clarence E             | 12041         | George & Sipes, LLP  | 151 North Delaware St., Ste. 1700, Indianapolis, IN 46204 |  | \$5,000.00           |
| Merritt, James & Bonnie         | 12042         | George & Sipes, LLP  | 151 North Delaware St., Ste. 1700, Indianapolis, IN 46204 |  | \$5,000.00           |
| Minnick, Ralph D                | 12043         | George & Sipes, LLP  | 151 North Delaware St., Ste. 1700, Indianapolis, IN 46204 |  | \$5,000.00           |
| O'Brien, Michael & Ingrid       | 12044         | George & Sipes, LLP  | 151 North Delaware St., Ste. 1700, Indianapolis, IN 46204 |  | \$5,000.00           |
| Phelps, John W & Deborah        | 12045         | George & Sipes, LLP  | 151 North Delaware St., Ste. 1700, Indianapolis, IN 46204 |  | \$5,000.00           |
| Phillips, Robert                | 12046         | George & Sipes, LLP  | 151 North Delaware St., Ste. 1700, Indianapolis, IN 46204 |  | \$5,000.00           |
| Proud, Douglas & Esther         | 12047         | George & Sipes, LLP  | 151 North Delaware St., Ste. 1700, Indianapolis, IN 46204 |  | \$5,000.00           |
| Russell, Thomas & Norma         | 12048         | George & Sipes, LLP  | 151 North Delaware St., Ste. 1700, Indianapolis, IN 46204 |  | \$5,000.00           |
| Smith, James O. & Betty         | 12049         | George & Sipes, LLP  | 151 North Delaware St., Ste. 1700, Indianapolis, IN 46204 |  | \$5,000.00           |
| Stansbury II, Robert            | 12050         | George & Sipes, LLP  | 151 North Delaware St., Ste. 1700, Indianapolis, IN 46204 |  | \$5,000.00           |
| Stuck, Ronald P & Shelley A     | 12051         | George & Sipes, LLP  | 151 North Delaware St., Ste. 1700, Indianapolis, IN 46204 |  | \$5,000.00           |

ATTACHMENT A  
GEORGE SIPES, LLP CLAIMANT/CREDITOR LIST  
DELPHI BANKRUPTCY

| Creditor Name                  | Claim Number | Creditor Notice Name | Creditor Notice Address                                   | August 9, 2007 |            |
|--------------------------------|--------------|----------------------|---|----------------|------------|
|                                |              |                      |   | Modified Claim | Value      |
| Waldo, Richard L & Gwendolyn A | 12052        | George & Sipes, LLP  | 151 North Delaware St., Ste. 1700, Indianapolis, IN 46204 |                | \$5,000.00 |
| Yates, Dale & Jacqueline R     | 12053        | George & Sipes, LLP  | 151 North Delaware St., Ste. 1700, Indianapolis, IN 46204 |                | \$5,000.00 |

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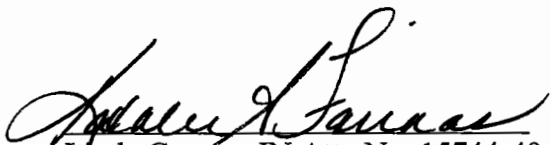
**PROOF OF SERVICE**

Kathleen A. Farinas, an attorney for the firm of George & Sipes, LLP, states that she caused the Response of George & Sipes, LLP Claimants to Debtors' Nineteenth Omnibus Objection (Substantive) Pursuant To 11 U.S.C. §502(B) and Fed.R.Bankr.P. 3007 to Certain (A) Insufficiently Documented Claims, (B) Claims Not Reflected On Debtors' Books And Records, (C) Untimely Claim, and (D) Claims Subject To Modification, Tax Claims Subject To Modification, Modified Claims Asserting Reclamation, and Consensually Modified And Reduced Claims to be filed with the Clerk of the Court using the ECF system on August 9, 2007, as well as mailing a copy along with this Proof of Service upon the following parties by placing copies of the same in a U.S. Mail depository, postage prepaid, and clearly addressed on the date stated:

Delphi Corporation  
Attn: General Counsel  
5725 Delphi Drive  
Troy, Michigan 48098

John Wm. Butler, Jr.  
John K. Lyons  
Joseph N. Warton  
Skaden, Arps, Slate, Meagher & Flom, LLP  
333 West Wacker Drive, Suite 2100  
Chicago, IL 60606

Dated this the 9<sup>th</sup> day of August, 2007



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Kathleen A. Farinas, IN Atty No. 20283-34  
George & Sipes, LLP  
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